Southwire Building Wire Plant
Three Southwire Drive
Carrollton, Georgia 30117, USA
Tel. (770) 832-4242, Fax (770) 832-4714
www.southwire.com

Southwire®

September 29, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Attached is the National Environmental Achievement Track application for the Southwire Carrollton Building Wire Plant, Carrollton Georgia. If you have any questions, please contact me at 770-832-5091.

Sincerely yours,

Southwire Carrollton Building Wire Plant

Greg McKibben
Environmental, Health and Safety Manager

Enclosures

AOH-6022

National Environmental Achievement Track

Application Form

Southwire Carrollton Building Wire Plant
Name of facility

Southwire Company
Name of parent company (if any)

Three Southwire Drive
Street address

Street address (continued)

Carrollton, Georgia 30117
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Greg McKibben

Title Environmental, Health, and Safety Manager

Phone 770-832-5091

Fax 770-832-4714

E-mail greg_mckibben@southwire.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- **Provide background information on your facility.**
- **Identify your environmental requirements.**

1 What do you do or make at your facility?

The Southwire Carrollton Building Wire Plant produces copper and aluminum building wire and cable for residential and industrial electrical applications.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3357

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

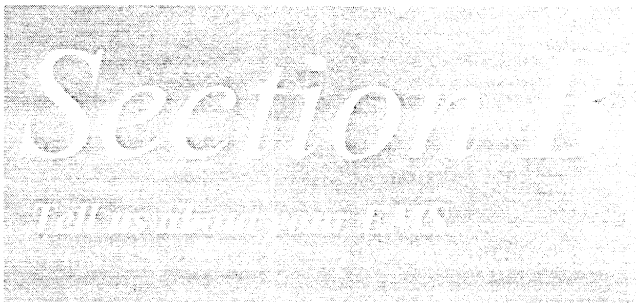
5 Does your facility have an EPA ID number(s)? If yes, list in the right-hand column.	☒ Yes ☐ No GAD - 003264421
6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right ***or*** enclose a completed Checklist with your application.	See attached checklist
7 Check the appropriate box in the right-hand column.	☐ I've listed the requirements above. ☒ I've enclosed the Checklist with my application.
8 Optional: Is there anything else you would like to tell us about your facility?	The Southwire Carrollton Building Wire Plant has won the following awards: • Georgia Pollution Prevention Partners Program Achievement Level 2000 • Georgia Pollution Prevention Partners Program Achievement Level 1999 • Governor's Award for Pollution Prevention 1998 • Georgia Pollution Prevention Partners Program Entry Level 1997 • Southwire's 1995-1998 CEO's Consistent Achiever Award for Pollution Prevention

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- **Confirm that your EMS meets the Achievement Track requirements.**
- **Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.**



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy — ☒ Yes

b. Planning — ☒ Yes

c. Implementation and operation — ☒ Yes

d. Checking and corrective action — ☒ Yes

e. Management review — ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? — ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? — ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? — ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

- ☐ GEMI
- ☒ Other
- ☐ CEMP

☐ Third-party assessment

- ☐ ISO 14001 Certification
- ☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This mec that you can describe past achievements and will mc future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 **Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.**

Note to small facilities: **If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.**

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Recycled Materials	17,609	Pounds Of Waste Per Million Pounds Of Production	10,881	Pounds Of Waste Per Million Pounds Of Production

i. How is the current level an improvement over the previous level?

The current level is a 38.2% decrease in the pounds of waste insulation generated during the production of wire. The project also allowed us to more than double the amount of waste insulation that was recycled during the same time period.

Year	Pounds per Million Pounds of Production	Pounds of Recycled Insulation
1997	17,609	530,816
1998	15,896	713,467
1999	10,881	1,165,310

ii. How did you achieve this improvement?

This improvement was accomplished through the installation of bleed ports on wire insulation extrusion lines. The bleed ports give the operators a mechanism for bleeding one type of insulation separately from the other type insulation used (a commingled glob can not be recycled). The clean insulation can be used in other insulating applications within the plant.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Materials Re-Use - Carbon Black	70,060	Pounds	36,660	Pounds

i. How is the current level an improvement over the previous level?

The current level is a 48% reduction over the previous level. This represents significant reductions in waste generation, purchase of raw materials, and production costs.

ii. How did you achieve this improvement?

The improvements were realized through the installation of a drum tumbler that allows carbon black to be collected and reintroduced back into the plastics manufacturing process. Additional reductions were achieved by improving the feeder calibration process so that the number of samples was reduced and samples are now reintroduced back into the plastics manufacturing process.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect? Total Water Use - Process Water Use Reduction

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — 63,000,000/gallons per year (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 31,500,000/gallons per year (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

The improvements will be achieved through the implementation of more efficient processes and technologies.

Second aspect you've selected

a. What is the aspect?

Hazardous Solid Waste Reduction – Waste PVC Fines

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 229,880/Pounds per Year (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value 57,470/Pounds per Year (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

The improvements will be achieved through the implementation of more efficient processes and technologies, which are designed to reduce and ultimately eliminate this hazardous waste stream.

Third aspect you've selected

a. What is the aspect?

Recycled/Re-used Materials - Recycle Nylon

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — 23,000/Pounds per Year (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — 8,050/Pounds per Year (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Increasing the amount of waste nylon that can be recycled will be achieved through development and implementation of new process technology and the identification of additional outlets for marginal material. Increasing the amount of nylon that can be recycled results in equal reductions in the amount of waste nylon that must be disposed.

Fourth aspect you've selected

a. What is the aspect?

Total Solid Waste – Total Waste Volume Reduction

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value

(Quantity/Units)

☒ Option B: In terms of units of production or output

7,000 Pounds of Waste/million Pounds of Finished Goods (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A: Absolute value

Quantity/Units)

☒ Option B: In terms of units of production or output

1,400 Pounds of Waste/Million Pounds of Finished Goods (Quantity/Units)

e. How will you achieve this improvement?

The total waste volume reductions will be achieved through the development of Environmental Corrective Action Teams. These teams will evaluate individual processes and waste streams and implement changes to reduce waste generation rates based on established Pollution Prevention / Waste Minimization procedures.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should hav appropriate mechanisms in place to identify communi concerns, to communicate with the public, and to pro information on your environmental performance.

What do you need to do?

- **Describe your approach to public outreach.**
- **List three references who are familiar with your facility.**

1 How do you identify and respond to community concerns?

The Environmental Management System has procedures for handling public concerns. Most public concerns are channeled through the corporate offices.

2 How do you inform community members of important matters that affect them?

Newspapers and radio are most commonly used to inform the public. The public is also informed through community meetings and Southwire's Internet site.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.southwire.com

☐ Newspaper

☐ Open Houses

☐ Other

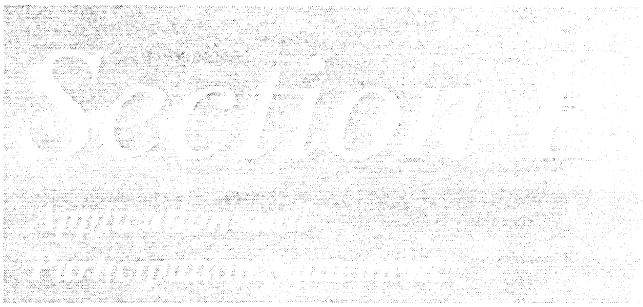
4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	City of Carrollton, Southwire Citizen Advisory Board	Gerald Pilgrim	770-830-2000
State/Local Regulator	Georgia Department of Natural Resources, Pollution Prevention Assistance Division	Bob Kerr	404-651-5120
Other community/local reference	Local Emergency Planning Committee	Tim Padgett	770-832-5882

On behalf of Southwire Carrollton Building Wire Plant [my facility],



I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Richard D Miller 9/27/00

Printed Name/Title Richard Miller / Plant Manager

Facility Name Southwire Carrollton Building Wire Plant

Facility Street Address Three Southwire Drive

Facility ID Numbers GAD - 003264421

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name Southwire Carrollton Building Wire Plant
Facility Location: Three Southwire Drive, Carrollton Georgia 30117
Facility ID Number(s): GAD - 003264421
(attach additional sheets if necessary)

Air Pollution Regulations	Check All That Apply
1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2. Permits and Registration of Air Pollution Sources	☒
3. General Emission Standards, Prohibitions and Restrictions	☒
4. Control of Incinerators	☐
5. Process Industry Emission Standards	☒
6. Control of Fuel Burning Equipment	☒
7. Control of VOCs	☒
8. Sampling, Testing and Reporting	☒
9. Visible Emissions Standards	☒
10. Control of Fugitive Dust	☒
11. Toxic Air Pollutants Control	☒
12. Vehicle Emissions Inspections and Testing	☐
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13.	☐
14.	☐

Hazardous Waste Management Regulations	
1. Identification and Listing of Hazardous Waste (40 CFR 261)	
- Characteristic Waste	☒
- Listed Waste	☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
- Manifesting	☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒

3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
   - Transfer facility requirements ☐
   - Manifest system and record-keeping ☐
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
   - General facility standards ☒
   - Preparedness and prevention ☒
   - Contingency plan and emergency procedures ☒
   - Manifest system, Record keeping and reporting ☒
   - Groundwater protection ☒
   - Financial requirements ☒
   - Use and management of containers ☒
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. 40 CFR 268 ☒
9. 40 CFR 279 ☒

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☒
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☒
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☒
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☒
4. Chemical Information Rules (40 CFR 712) ☒
5. Health and Safety Data Reporting (40 CFR 716) ☒
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☒

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☒
4. Pesticide Licensing Requirements ☒
5. Labeling of Pesticides ☒
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☒
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

☐

2. RCRA Corrective Action (identify)
   Solid Waste Management Units ☒

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. ☐
4. ☐